

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ MAR 29 2024 ★

LONG ISLAND OFFICE

-----X.

JEFF S. ROTH

Complaint for a Civil Case

-against-

Case No. _____

FARMINGDALE UNION FREE SCHOOL DISTRICT

Jury Trial: Yes

-----X

CV 24 2418

KOVNER, J

LINDSAY, M.J.

I. The Parties to This Complaint

A. The Plaintiff

Jeff S. Roth
20 Frank Avenue
Farmingdale, Nassau County
New York, 11735
516-420-3451

B. The Defendants

Farmingdale U.S.F.D.
50 Van Cott Avenue
Farmingdale, Nassau County
New York, 11735
516-434-5100

II. Basis for Jurisdiction

- A. A federal question on the United States Constitutional Rights Freedom of Speech and Right to Access
- B. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C § 1331, 1343, and 1346, as this action challenges Defendants' violation of Plaintiffs' civil rights pursuant to 42 U.S.C § 1983.
- C. A federal question of a violation of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101. Subchapter III section 12181, Public Accommodations and Services by Private Entities

III. Statement of Claim

- 1. On March 5, 2024, a letter was taped to my door informing me I was prohibited from district property until June 2024.
- 2. This "Suspension" is for the reason the Board of Education did not want me to speak at the following March 6, 2024 meeting nor the upcoming budget meetings before the May 2024 vote.
- 3. This is the third time due to this district's unconstitutional "Prohibitions" that I have filed a complaint with this court. The past two complaints were dismissed on technicalities.
- 4. It is due to the intentional infliction of emotional distress and this board of education's smear campaign I was declared disabled as a result of long-term stress

exposure. I was diagnosed with PTSD suffering from debilitating panic anxiety attacks due to over a decade of harassment and violations of my civil rights.

5. The debilitating panic anxiety attacks started on or about 2013 when I was informed via affidavit that the board of education initiated a "Joint Investigation" into my background with the Nassau County Police Department and the FBI. The board of education claimed I was a security threat even though I was advocating for security improvements since 2000 when the SAVE Act was passed.
6. I have requested the court in the past to assign counsel since I was not represented on the first complaint and not properly represented by a pro-bono attorney on the second. Both complaints were dismissed on technicalities.
7. The second complaint which was dismissed for allegedly being "Moot" the pro-bono attorney abandoned and "Quietly Quit" the case midway through. The attorney did not respond properly since the argument that the complaint was "Moot" was incorrect and new evidence was to be submitted.
8. I have requested for both complaints to be brought before a Magistrate of to utilize the Mediation Advocacy Program where the counsel representing the Farmingdale Board of Education refused mediation.
9. Within the March 5, 2024, the board of education has become even more brazen since "winning" the two previous complaints on technicalities. This is the first-time wording relating to my right to vote on district property has been included in the "Suspension". It also the first time the letter was not signed by all the board members nor delivered certified mail.
10. If this matter is not properly mediated or decided through a Jury trial then it will keep repeating as with this new March 5, 2024 "Prohibition". The court should understand the seriousness of this matter, take into consideration all the information which was submitted in the past, the lack of representation was not submitted including new pertinent evidence, and lastly now rises to the level of discrimination against a person with a disability.

IV. Relief

WHEREFORE, Plaintiff requests that judgement be entered in his favor and against Defendants as follows:

1. An award of damages to Plaintiff in the amount of Ten Million Dollars.
2. Cost of suit, including attorney fees and costs pursuant to 42 U.S.C § 1988.

V. Certificate and Closing

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Signature of Plaintiff 

Date of Signing March 27 2024

Printed Name of Plaintiff JEFF S. ROTH

NASSAU COUNTY POLICE DEPARTMENT

CASE REPORT

Case Folder Number: 2024CR321415

CASE DATA**Reported As:** SUSPOCC - Suspicious Occurrence**Reporting Officer:** 10824 - Coleman, Brian H**Command:** 008**Reported On:** 03/06/2024 @ 1949**Reporting Agency:** NASSAU COUNTY POLICE DEPARTMENT**Occurred On:** 03/06/2024 @ 1945 (Wednesday)**Incident Location:**

70 VAN COTT AVE

Farmingdale, NY

Detective Assigned:**Precinct of Incident:** 8th Precinct**Post of Incident:** 810**OFFENSE(S)****Offense:** Z - UNUSUAL/SUSPICIOUS INCIDENT**Class:****Category:****Location Type:****SUSPECT(S)****Name:** Roth, Jeffrey Scott**DOB:** 05/11/1971**Age:** 52**Sex:** Male**Race:** White**Ethnicity:** Non Hispanic or Latino**Contact Information****Address**

Home: 5 4th Ave SOUTH FARMINGDALE, NY 11735

Home: 20 FRANK AVE SOUTH FARMINGDALE, NY 11735

Phone

Mobile: (631) 252-2154

Mobile: (516) 420-3451

Physical Characteristics**Eye Color:** Blue**Complexion:** Light**Hair Color:** Brown**Teeth:****Hair Style:** Bald/Balding**Facial Hair:** Full Beard and Mustache**Hair Length:** Long**Height:** 5' 8"**Build:** Medium**Weight:** 160**Clothing:** gray hat, maroon shirt, blue jeans, tan boots.**VICTIM(S)****Name:** WELDON E HOWITT JR HIGH SCHOOL**Victim Type:** Business**Victim Of:** 1. Z - UNUSUAL/SUSPICIOUS INCIDENT -**Contact Information****Address**

School: 70 VAN COTT AVE Farmingdale, NY 11735

Phone

Other: (516) 434-5410

NARRATIVE

Suspect ROTH, JEFFREY SCOTT (DOB: 05/11/1971) did enter the Weldon E. Howitt JR Highschool property and building. On 03/05/2024, suspect was notified by the school district that he is prohibited from entering the buildings and grounds of the Farmingdale Union Free School District. School security requested the suspect be removed from the property. Officers advised the suspect that he needed to leave immediately, and the suspect did exit the property without incident. Suspect does not have an active order of protection against him from the Farmingdale Union Free School District. Suspect was run in eJustice and PremierOne for wants, warrants, and orders with negative results. Sgt. Reitan on scene.

RMP 810

20 Rock Avenue
Farmingdale NY 11735



Retail



11722

RDC 99

U.S. POSTAGE PAID
FCM LG ENV
FARMINGDALE, NY 11735
MAR 27, 2024

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Attention:
Prose office

UNITED STATES DISTRICT COURT
EASTERN DISTRICT of New York
Long Island Court House
100 Federal Plaza
Central Islip, NY 11722

3/29

